



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, Ca. 94105

23 AUG 1991

In reply, refer to H-4-3

Colonel Charles F. Barlow
Department of the Air Force
Headquarters Western Space and
Missile Center (AFSPACECOM)
Vandenberg Air Force Base, CA 93437-6021

Dear Colonel Barlow:

On August 12, 1991, Lt. Col. John Sipos of Vandenberg Air Force Base and William Anderson of Environmental Management Consultants, Inc. hand delivered three copies of a revised waste analysis plan in response to a February 9, 1990 Notice of Violation (NOV) issued by the Environmental Protection Agency (EPA). The plan was reviewed by Vicki Smith of my section and verbal comments on the waste analysis plan were given to Lt. Col. Sipos on August 13, 1991. Details of the discussion and steps required to resolve the 1990 NOV are outlined below.

- In annex P, the parameter named to test for toxicity is EP toxicity. The Toxic Characteristic (TC) replaced EP toxicity for large quantity generators and treatment, storage, and disposal facilities on September 25, 1990. The Toxic Characteristic Leaching Procedure (TCLP) replaced the Extraction Procedure (EP) to determine Resource Conservation and Recovery Act (RCRA) wastes that are toxic. The TCLP is used at Vandenberg to determine toxic wastes (as evidenced by TCLP analytical results in Annex Q). Annex P should be changed to reflect this situation.

- The method of sampling waste streams named in Annex P is grab sampling. Although this method is adequate, the procedure for obtaining a representative sample of the waste is not outlined in the waste analysis plan. To obtain a representative sample of waste, at a minimum, each distinct phase of the waste must be sampled as well as obtaining composite samples of singly phased wastes. The waste analysis plan outlines the sampling instrument needed for each type of sampling situation as well as the amount needed for each sample and extensive information on personal protection equipment. This information contributes to producing a representative sample of waste, however specific instructions on how to obtain a representative sample of each type of waste (phased liquid, granular solid, sludge, etc.) needs to be included.

- The specific instructions in 40 CFR 265.200 (a) for waste analyses for tanks require that the owner or operator of the tank must, whenever a tank system is to be used to treat chemically or to store a hazardous waste that is substantially different from waste previously treated or stored in that tank, or treat chemically a hazardous waste with a substantially different process than any previously used in that tank system: conduct waste analyses and trial treatment or storage tests; or obtain written, documented information on similar waste under similar operating conditions to show that the proposed treatment or storage will meet the requirements of 265.194 (a). The waste analysis plan does not provide for changes in waste in tank systems at Vandenberg. Specific instructions, similar to those above, should be included in the waste analysis plan as a parameter to initiate a change in the hazardous waste profile/receipt sheet when the waste in a tank changes.

- The 40 CFR 265 regulations concerning waste analysis plans are listed in Vandenberg's waste analysis plan. A statement indicating that Vandenberg intends to implement and follow these regulations should be included in the plan.

The satisfactory, prompt correction of the waste analysis plan as outlined above will satisfy the notice of violation for the December, 1989 EPA compliance evaluation inspection. The corrections should be completed within 30 days of your receipt of this letter.

Vandenberg is an extremely large facility, both in size and numbers of waste streams. The effort needed to coordinate these waste streams into one plan is appreciated as well as the promptness of Vandenberg's response. The present waste analysis plan is greatly improved over all previous revisions. The extensive personal protection equipment section and extremely thorough identification of waste streams generated at Vandenberg are particularly well done.

Included as attachments to this letter are several documents requested by Lt. Col. John Sipos. These include: a RCRA Part B Application Completeness/Technical Evaluation Checklist (although this is the most recent guidance document available for EPA Region 9, please note that this checklist is dated 8/89, subsequent revisions to RCRA have occurred that are not reflected in this document, including the promulgation of the TC Rule), a list of guidance documents available from the RCRA Hotline, and a completed CEI checklist for the waste analysis plan.

If you have any questions, please call Vicki Smith of my section at (415) 744-2124.

Sincerely,

Jane Diamond
Chief
Compliance Section

cc: Julio Navarez, Cal EPA Region 3 w/attach
Larry Matz, Cal EPA, HQ w/out attach
Larry Stock, Cal EPA Region 3 w/out attach